

1 MELINDA HAAG (CABN 132612)
United States Attorney
2
3 J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division
4
5 ACADIA L. SENESE (CABN 251287)
Assistant United States Attorney

6 450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
7 Telephone: (415) 436-6809
FAX: (415) 436-7234
- academia.senese@usdoj.gov

8 Attorneys for United States of America
9

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) No. CR 13-0287 JST
14 v.)
15) STIPULATION AND [PROPOSED] ORDER TO
16) CONTINUE CHANGE OF PLEA HEARING
17 BRADY BELL, et al.,)
18 Defendant.)

19 The above-captioned matter is set on February 14, 2014 at 2:00 p.m. before this Court for a
20 change of plea. However, despite the parties' best efforts to resolve this matter expeditiously, the parties
21 need additional time to confer and the government needs additional time to secure the requisite
22 approvals for a proposed disposition. Undersigned counsel conferred with the Court's deputy clerk and
23 the earliest next available date that is agreeable to all a parties is March 28, 2014 at 9:30 a.m..
24 Accordingly, the parties hereby stipulate to continue the status conference from February 14, 2014 to
25 March 28, 2014 at 9:30 a.m.

26 The parties further stipulate and agree that the ends of justice served by this continuance
27 outweigh the best interest of the public and the defendant in a speedy trial. The parties agree that the
28 failure to grant this continuance would unreasonably deny defendant effective preparation of counsel.

STIPULATION AND [PROPOSED] ORDER TO CONTINUE CHANGE OF PLEA HEARING
CR 13-0287 JST

FILED

FEB 13 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 Accordingly, the parties agree that the period of time from February 14, 2014 to March 28, 2014 should
2 be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

3 DATED: February 13, 2014

Respectfully submitted,

4 MELINDA HAAG
5 United States Attorney

6 /S/
7 ACADIA L. SENESE
8 Assistant United States Attorney

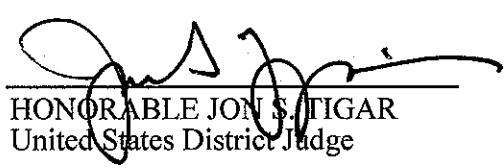
9
10 DATED: February 13, 2014

/S/
11 GAIL SHIFMAN
Counsel for Mr. Brady Bell

12 ORDER

13 Based on the reasons provided in the stipulation of the parties above, IT IS HEREBY
14 ORDERED that the hearing date of February 14, 2014, scheduled at 2:00 p.m., is vacated and reset to
15 March 28, 2014, at 9:30 a.m. for a change of plea hearing. It is FURTHER ORDERED that time is
16 excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from February 14, 2014 to March
17 28, 2014, for effective preparation of counsel.

18
19 DATED: 2/13/14

20 
HONORABLE JON S. TIGAR
United States District Judge